

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

WILMINGTON SAVINGS FUND SOCIETY,
FSB, D/B/A CHRISTIANA TRUST, NOT
INDIVIDUALLY BUT AS TRUSTEE FOR
CARLSBAD FUNDING MORTGAGE
TRUST,

Plaintiff,

v.

BRENDA J. DUZAN; FIRST NATIONAL
BANK OF OMAHA; ALSO ALL PERSONS
OR PARTIES UNKNOWN CLAIMING ANY
RIGHT, TITLE, LIEN, OR INTEREST IN THE
PROPERTY DESCRIBED IN THE
COMPLAINT HEREIN,

Defendants.

Case No. 3:16-cv-05721-RBL

DECLARATION OF NICOLAS DALUIO
IN SUPPORT OF PLAINTIFF'S MOTION
TO REMAND

I, Nicolas Daluiso, declare:

1. I am a duly licensed attorney and attorney of record for WILMINGTON SAVINGS
FUND SOCIETY, FSB, D/B/A CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE
FOR CARLSBAD FUNDING MORTGAGE TRUST, and make the Declaration based on personal
knowledge.

2. Defendant Brenda J. Duzan (hereinafter "Duzan") was personally served a copy of the Summons and Complaint on December 30, 2014.

3. Defendant Duzan filed a Notice of Appearance *pro se* on January 29, 2015.

4. On January 16, 2015, Defendant Duzan filed a Motion to Dismiss the Plaintiff's Complaint for lack of standing.

5. The court denied Defendant Duzan's Motion to Dismiss on February 6, 2015.

6. On March , 2015, Defendant Duzan filed an Answer and Affirmative Defenses.

7. Defendant Duzan removed this matter to federal court on August 17, 2016, 595 days after service of Defendant Duzan.

I declare under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 8th day of September, 2016, at Seattle, Washington.

/s/ Nicolas Daluiso
Nicolas Daluiso, WSB #23505
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2016, I electronically filed the foregoing DECLARATION OF NICOLAS DALUISO IN SUPPORT OF PLAINTIFF'S MOTION TO REMAND with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all parties as listed on the Notice of Electronic Filing.

I further certify that on September 8, 2016, in compliance with the notification requirements pursuant to the laws of the State of Washington, I caused to be deposited in the United States first class mail, postage pre-paid, copies of the foregoing DECLARATION OF NICOLAS DALUISO IN SUPPORT OF PLAINTIFF'S MOTION TO REMAND, addressed to each of the following:

Brenda J Duzan
17426 85TH AVE CT E
PUYALLUP, WA 98375
Pro Se

DATED this 8th day of September, 2016, at Seattle, Washington.

/s/ Natalie Quarnstrom
Natalie Quarnstrom
An employee of Robinson Tait, P.S